

**Remarks/Arguments**

**A. Claims in the Case**

Claims 1-7, 9-11, 13-19, 21-30, 32-34, 36-42, 44-57, 59-61, 63-69, 71-73, and 147-152 are pending. Claims 1, 24, and 51 have been amended.

**B. Claim Objections**

The Examiner objected to claim 1. Claim 1 has been amended for clarification to recite “A method for processing Financial Service Organization (FSO) transactions, comprising”.

**C. The Claims Are Not Obvious In View of Pinard in view of Bierenbaum Under 35 U.S.C. §103(a)**

The Examiner rejected claims 1-7, 9-11, 13-19, 21-30, 32-34, 36-42, 44-57, 59-61, 63-69, 71-73 and 147-152 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,075,851 to Pinard et al. (“Pinard”) in view of U.S. Patent No. 6,970,844 to Bierenbaum (“Bierenbaum”). Applicant respectfully disagrees with these rejections.

To reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner*, 154 U.S.P.Q. 173, 177-78 (C.C.P.A. 1967). To establish *prima facie* obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974); MPEP § 2143.03.

In addition, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

Claims 1, 24, and 51 describe combinations of features including, but not limited to:

- creating a model of an FSO comprising a plurality of processing relationship software objects, wherein creating the model of the FSO comprises:
  - selecting at least two processing relationship object representations from the displayed processing relationship object representations;
  - preparing a processing relationship definition for at least two of the selected processing relationship object representations, wherein preparing the processing relationship definitions includes:
    - creating a highest level processing relationship object in a processing relationship structure, wherein the highest level processing relationship object represents an FSO;
    - creating a plurality of lower level processing relationship objects in the processing relationship structure, wherein the plurality of lower level processing relationship objects in the processing relationship structure are descendents of the highest level processing relationship object, wherein one or more of the lower level processing relationship objects represents a bank branch office, a regional bank, a credit card issuer, or an acquirer

The combination of Pinard and Bierenbaum does not appear to teach or suggest at least the above-quoted features of claims 1, 24, and 51, in combination with the other features of the claims.

Applicant's claims are directed to a method that includes creating a model of an FSO including a plurality of processing relationship software objects. Creating the model of the FSO includes preparing a processing relationship definition for at least two of selected processing relationship object representations. A highest processing relationship object represents the FSO.

One or more lower level processing relationship object representations represent a bank branch office, a regional bank, a credit card issuer, or an acquirer.

With respect to the feature “creating a highest level processing relationship object in a processing structure, wherein the highest level processing relationship object represents an FSO”, the Examiner relies on col. 3, lines 4-8 and Fig. 3 of Pinard. The cited portion of Pinard states:

The database should also store the telephone directory number of each of the persons in the organization chart, as shown in FIG. 3. Records are shown in the directory which correlates names in a first column and extension (directory) numbers in a second.

Pinard discloses a database having the telephone directory number of each person in an organizational chart. The names in a first column of the directory are correlated with numbers in a second column of the directory. The Examiner acknowledges that Pinard does not expressly disclose a Financial Service Organization (FSO) computer system. The Examiner nonetheless states: “It is interpreted that Pinard has a highest level processing relationship object in a processing structure and Bierenbaum discloses a Financial service Organization with relationship objects in a hierarchical tree structure.” Applicant submits, however, that the cited portion of Pinard and Bierenbaum, whether taken separately or in combination, do not teach or suggest creating a highest level processing relationship object in a processing structure, the highest level object representing a Financial Service Organization.

Amended claims 1, 24, and 51 describe:

creating a plurality of lower level processing relationship objects in the processing relationship structure, wherein the plurality of lower level processing relationship objects in the processing relationship structure are descendents of the highest level processing relationship object, wherein one or more of the lower level processing relationship objects represents a bank branch office, a regional bank, a credit card issuer, or an acquirer

Pinard states:

The database contains an organizational chart 15 as shown in FIG. 2, which contains definitions of roles and associates them with names of individuals. What

is meant by definitions of roles is relationships of reporting structures, identification of groups, etc. For example, in FIG. 2, both Helen and Joe are shown reporting to Bill, Fred reports to Joe, Jane is Fred's secretary, and the group comprising John, Mary and David report to Fred.  
(Pinard, col. 2, lines 57-65)

Pinard discloses a database containing an organizational chart with definitions of employee roles and reporting structure, such as "Fred reports to Joe". Pinard, taken separately or in combination with the other cited art, does not appear to disclose a lower level processing relationship object representing a bank branch office, a regional bank, a credit card issuer, or an acquirer.

The Examiner states:

In Fig. 2 objects are arranged in a hierarchy, so there is a highest level ((Bill) and lower levels (everyone below Bill). The lower levels are descendents of the highest level and the lower levels represent a business unit (employees of the corporation). The other types of entities besides the business unit are optionally recited and thus carry no patentable weight. [*emphasis added*]

Applicant respectfully submits that "Bill" is not an FSO, and no employee below Bill is a bank branch office, a regional bank, a credit card issuer, or an acquirer. Further, the Examiner appears to take the position that each lower level employee is a "business unit." Based on the Examiner's statement that "the other types of entities besides the business unit are optionally recited and thus carry no patentable weight", Applicant believes that the Examiner is basing the rejection of claims 1, 24, and 51 on the language of Applicant's claims before Applicant's amendment of March 26, 2007. In particular, claims 1, 24, and 51 previously recited "lower level processing relationship objects represents a company of the FSO, a business unit of the FSO, a bank branch office, a regional bank, a credit card issuer, or an acquirer." (See Amendment; Response to Office Action Mailed October 24, 2006). After the amendment of March 26, 2007, however, claim 1 recites: "lower level processing relationship objects representing a bank branch office, a regional bank, a credit card issuer, or an acquirer." [*Emphasis added*]. Thus, "business unit" is no longer recited as a lower level processing

relationship object. Applicant respectfully submits that whether or not a subordinate employee disclosed in Pinard could be considered to be a “business unit”, the employee is not a bank branch office, a regional bank, a credit card issuer, or an acquirer. As such, Pinard does not appear to teach or suggest “a lower level processing relationship object representing a bank branch office, a regional bank, a credit card issuer, or an acquirer, as recited in claims 1, 24, and 51 as amended.

Applicant submits that, for at least the reasons discussed above, claims 1, 24, and 51, and the claims depending thereon, are patentable over the cited art. Applicant therefore respectfully requests removal of the 35 U.S.C. §103(a) rejections of these claims.

Applicant submits that many of claims dependent on claims 1, 24, and 51 are independently patentable. For example, amended claim 4 recites: “wherein the processing relationship value is configured for use in identifying an FSO business entity as an owner of the FSO transaction-related data, wherein the FSO business entity is a bank branch office or a regional bank or a credit card line or an issuer or an acquirer”.

The Examiner states:

As per claims 4, 27, 54, 147, and 150, Pinard discloses, wherein the processing relationship value is configured for use in identifying an FSO business entity as an owner of the FSO transaction-related data, wherein the FSO business entity is a bank branch office or a regional bank or a credit card line or an issuer or an acquirer. In Fig. 2 of Pinard shows a business entity as a company and a business unit (see col. 2, lin 62- col.. 3, line 3 and lines 27-32) [*emphasis added*]

Applicant believes that the Examiner is basing the rejection of the claim 4 on the language of Applicant’s claims before Applicant’s amendment of March 26, 2007. In particular, claim 4 previously recited “wherein the FSO business entity is a company or a business unit or a bank branch office or a regional bank or a credit card line or issuer or an acquirer.” (See Amendment;

Response to Office Action Mailed October 24, 2006). After the amendment of March 26, 2007, however, claim 1 recites: “wherein the FSO business entity is a bank branch office or a regional bank or a credit card line or an issuer or an acquirer.” [*emphasis added*]. Pinard does not appear to teach or suggest wherein the processing relationship value is configured for use in identifying an FSO business entity as an owner of the financial service organization transaction-related data, wherein the FSO business entity is a bank branch office or a regional bank or a credit card line or an issuer or an acquirer.

Concerning claim 147 and 150, the Examiner states:

As per claims 4, 27, 54, 147, and 150, Pinard discloses, wherein the FSO business entity is a company or a business unit or a bank branch office or a regional bank or a credit card line or an issuer or an acquirer. In Fig. 2 of Pinard shows a business entity as a company and a business unit (see col. 2, lin 62- col. 3, line 3 and lines 27-32)

Applicant notes that claims 147 and 150 include different features than claim 4. For example, claim 147 recites: “wherein the plurality of lower level processing relationship objects comprises a credit card issuer object representing a credit card issuer and an acquirer object representing an acquirer, and wherein each of the credit card issuer object and the acquirer object has one or more descendent processing relationship objects.” Claim 150 recites: “wherein at least one of the one or more descendent processing relationship objects represents a bank branch.” Neither Pinard nor the other cited art appears to teach or suggest these features in combination with the other features of claims.

Claim 11 recites: “wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number for at least one of the plurality of lower level processing relationship objects and a level number for the at least one lower level processing relationship object, wherein the level number

identifies a level in the processing relationship structure.” The cited art does not appear to teach or suggest this feature in combination with the other features of claim 11.

The Examiner states:

As per claims 11, 34, 61, 148, 151, Pinard discloses, wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number and a level number. (Fig. 3 – shows displayed values in a sequence number for the lower level processing objects and the name identifies level number in the processing relationship structure beginning in with the name Helen, Joe, or Fred (lower level processing objects)).

Applicant respectfully disagrees that Fig. 3 of Pinard discloses the above-quoted features of claim 11. Fig. 3 of Pinard discloses only a name column (e.g., “Bill”) and an extension # column (e.g., “1600”). For example, even if an employee’s extension number could be considered a “sequence number”, Pinard does not teach or suggest a level number for the at least one lower level processing relationship object, wherein the level number identifies a level in the processing relationship structure. For at least these reasons, Applicant submits that Pinard does not teach or suggest displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number for at least one of the plurality of lower level processing relationship objects and a level number for the at least one lower level processing relationship object, wherein the level number identifies a level in the processing relationship structure.

Regarding claim 151, the Examiner states:

As per claims 11, 34, 61, 148, 151, Pinard discloses, wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number and a level number. (Fig. 3 – shows displayed values in a sequence number for the lower level processing objects and the name identifies level number in the processing

relationship structure beginning with the name Helen, Joe, or Fred (lower level processing objects)).

Applicant notes that claim 151 includes different features than claim 11. For example, claim 151 recites: “wherein displaying the at least two processing relationship object representations comprises displaying a row for each of at least two processing relationship objects, wherein each of the rows comprises an object identifier and a level number, wherein the descendants of each object appear directly below that object.” Neither Pinard nor the other cited art appears to teach or suggest these features in combination with the other features of claims.

Claim 149 recites: “wherein at least one of the one or more descendent processing relationship objects represents a credit card issuer or an acquirer.” The cited art does not appear to teach or suggest this feature in combination with the other features of claim 149. Regarding claim 149, the Examiner states:

As per claims 5, 28, 55, and 149, Pinard discloses, wherein the selecting one or more processing relationship object representations is performed by a user of the FSO computer system (col. 4, lines 16—39 —Fred first types a command into a personal computer shown in Fig. 6 as “> Call My Group”. The user agent looks up the names of Fred’s group and they are displayed on Fred’s screen of his personal computer then he can select who he wants to call. This reads on claim limitation 5).

Applicant submits the portions of Pinard cited by the Examiner not appear to teach or suggest one or more descendent processing relationship objects representing a credit card issuer or an acquirer, in combination with the other features of claim 149.

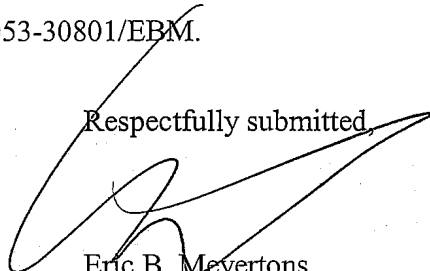


**D. Additional Remarks**

Based on the above, Applicant submits that the claims are now in condition for allowance. Favorable reconsideration is respectfully solicited.

If any extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-30801/EBM.

Respectfully submitted,



Eric B. Meyertons  
Reg. No. 34,876

Attorney for Applicant

MEYERTONS, HOOD, KIVLIN, KOWERT & GOETZEL, P.C.  
P.O. BOX 398  
AUSTIN, TX 78767-0398  
(512) 853-8800 (voice)  
(512) 853-8801 (facsimile)

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